

AO 91 (Rev. 11/11) Criminal Complaint

Officer:

AUSA: Susan Fairchild

Ilse Ramirez

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Luis REYES-PEREZ

Case No.

Case: 2:24-mj-30495

Assigned To : Unassigned

Assign. Date : 11/19/2024

Description: CMP USA v. LUIS

REYES-PEREZ (DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 14, 2024 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

Title 8, United States Code, Section 1326(a)

Unlawful Reentry Following Removal

This criminal complaint is based on these facts:

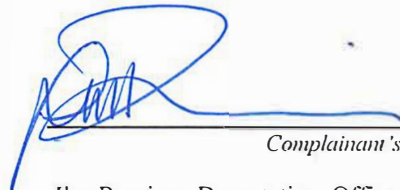
On or about November 14, 2024, in the Eastern District of Michigan, Southern Division, Luis REYES-PEREZ, a citizen and national of Mexico, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about April 19, 2011, and not having received the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security, to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 19, 2024

City and state: Detroit, MI


*Complainant's signature*Ilse Ramirez, Deportation Officer*Printed name and title*

*Judge's signature*Elizabeth A. Stafford U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Ilse Ramirez, declare the following under penalty of perjury:

1. I am a Deportation Officer employed with Immigration and Customs Enforcement (ICE) of the United States Department of Homeland Security, having served with ICE since January of 2024. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers and record checks of law enforcement databases. I have also reviewed relevant immigration records and system automated data relating to Luis REYES-PEREZ, which reveal the following:
2. Luis REYES-PEREZ is a thirty-six-year-old citizen and a native of Mexico who last entered the United States on an unknown date, at an unknown place, without inspection by the U.S. Department of Homeland Security.
3. On September 19, 2010, the Ohio State Police arrested REYES-PEREZ for Felony Possession of Cocaine.
4. On September 23, 2010, the Fairfield Municipal Court in Fairfield, OH convicted REYES-PEREZ for the offense of Attempted Possession of Cocaine and sentenced him to 180 days in jail with 1 day suspended.
5. On October 17, 2010, the Ohio State Police arrested REYES-PEREZ for Felony Forgery and Operating a Vehicle While Impaired.
6. On October 28, 2010, the Fairfield Municipal Court in Fairfield, OH convicted REYES-PEREZ for the offense of Attempted Forgery and Operating a Vehicle While Impaired and sentenced him to 180 days in jail with 90 days' suspended.
7. On April 11, 2011, ICE arrested REYES-PEREZ in the Butler County Jail, OH and served him with an I-862 Notice to Appear.
8. On April 14, 2011, an Immigration Judge in Cincinnati, OH, ordered REYES-PEREZ removed from the U.S. to Mexico.

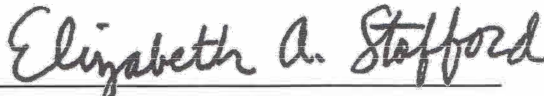
9. On April 19, 2011, ICE removed REYES-PEREZ to Mexico through Laredo, TX.
10. On October 7, 2024, the Sterling Heights Police Department arrested REYES-PEREZ for Controlled Substance - Possession of Methamphetamine /Ecstasy.
11. On November 13, 2024, the 41A District Court in Sterling Heights, MI convicted REYES-PEREZ of Controlled Substance Possession of Methamphetamine and sentenced him to 60 days in jail credited with time served.
12. On November 14, 2024, ICE arrested REYES-PEREZ in Mt Clemens, MI and served him with an I-871 Notice of Intent/Decision to Reinstate Prior Order.
13. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any non-citizen entering or attempting to enter the United States, or any non-citizen present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of noncitizens.
14. A review of immigration records (AXXX XXX 772) for REYES-PEREZ and queries in the U.S. Department of Homeland Security databases reveal that no record exists of REYES-PEREZ obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal from the United States on or about April 19, 2011.
15. Based on the above information, there is probable cause to believe that, on or about November 13, 2024 in the Eastern District of Michigan, Southern Division, REYES-PEREZ, an alien, who was denied admission, excluded, deported, and removed therefrom on or about April 19, 2011, was found in the United States, without having obtained the express consent of the

Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; all in violation of Title 8, United States Code, Section 1326(a).



Ilse Ramirez
Deportation Officer

Subscribed and sworn to before me in my Presence
and/or by reliable electronic means.



Honorable Elizabeth A. Stafford
United Magistrate Judge

Dated: November 19, 2024